

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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VALENTIA VILLETTI and FAIZA JIBRIL, M.D.,

Plaintiff,

18 Civ. 10200 (VBS)

- against -

GUIDEPOINT GLOBAL LLC,

Defendant.

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PLAINTIFFS' RESPONSE TO DEFENDANT'S FIRST REQUESTS  
FOR PRODUCTION OF DOCUMENTS

Plaintiffs Valentia Villetti and Faiza Jibril, M.D., respond to Defendant's First Requests for Production of Documents as follows:

1. Plaintiffs object to Request No. 1, on the grounds that it is not likely to result in the discovery of admissible, relevant evidence, as plaintiffs are not seeking damages for their mental and emotional distress. Notwithstanding the foregoing objections, plaintiffs respond that they have no documents responsive to Request No. 1.

2. Plaintiffs object to Request No. 2, on the grounds that it is not likely to result in the discovery of admissible, relevant evidence, as plaintiffs are not seeking damages for their mental and emotional distress.

3. Plaintiffs object to Request No. 3, on the grounds that it is not likely to result in the discovery of admissible, relevant evidence. Notwithstanding the foregoing objection, plaintiffs will produce their 2018 tax returns.

4. Plaintiffs object to Request No. 4, on the grounds that it is not likely to result in the discovery of admissible, relevant evidence. Notwithstanding the foregoing objection, plaintiffs produce Document Nos. 65-69.

5. Plaintiffs object to Request No. 5, on the grounds that it is not likely to result in the discovery of admissible, relevant evidence. Notwithstanding the foregoing objection, plaintiffs produce Document Nos. 70.

6. Plaintiffs object to Request No. 6, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

7. See Document Nos. 6-14, 21-27, 39

8. Plaintiffs object to Request No. 8, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

Notwithstanding the foregoing objections, plaintiffs produce Document Nos. 21-28.

9. Plaintiffs possess no documents responsive to Request 9.

10. Plaintiffs object to Request No. 10, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence. Notwithstanding the foregoing objections, plaintiffs respond that they possess no documents responsive to Request No. 10.

11. See Document Nos. 2-3

12. See Document No. 28.

13. See Document Nos. 6-14, 39.

14. Plaintiffs object to Request No. 8, on the grounds that it is confusing.

Notwithstanding the foregoing objection, plaintiffs possess no documents responsive to Request No. 14.

15. Plaintiffs object to Request No. 8, on the grounds that it is confusing.

Notwithstanding the foregoing objection, plaintiffs possess no documents responsive to Request No. 15.

16. See Document No. 71.

17. Plaintiffs object to Request No. 17, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

18. Plaintiffs object to Request No. 18, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

19. Plaintiffs object to Request No. 19, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

20. Plaintiffs object to Request No. 20, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

Notwithstanding the foregoing objections, plaintiffs produce Document Nos. 1-71.

21. Plaintiffs object to Request No. 21, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

22. Plaintiffs object to Request No. 22, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

23. Plaintiffs object to Request No. 23, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

24. Plaintiffs object to Request No. 24, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

25. Plaintiffs object to Request No. 25, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.



Notwithstanding the foregoing objections, plaintiffs respond that they possess no documents responsive to Request No.25

26. Plaintiffs object to Request No. 26, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

27. Plaintiffs object to Request No. 27, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

28. Plaintiffs object to Request No. 28, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

29. Plaintiffs object to Request No. 29, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

30. Plaintiffs object to Request No. 30, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

31. Plaintiffs object to Request No. 31, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

32. Plaintiffs object to Request No. 32, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

33. Plaintiffs object to Request No. 33, on the grounds that It is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

34. Plaintiffs object to Request No. 34, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

35. Plaintiffs object to Request No. 35, on the grounds that it is vague, overbroad, unduly burdensome, and not likely to result in the discovery of admissible, relevant evidence.

Dated: New York, New York  
August 30, 2019



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Stuart Lichten (SL-1258)  
LICHTEN & BRIGHT, P.C.  
Attorneys for Plaintiffs  
387 Park Avenue South - 5<sup>th</sup> Floor  
New York, New York 10016  
(646) 588-4872